



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

ROBERT J. MARTINEAU, JR.
COMMISSIONER

BILL HASLAM
GOVERNOR

October 20, 2016

Via Electronic Mail to tburgess@depainc.com

Tina M. Burgess, Environmental Consultant
Development & Environmental Planning Associates, LLC
484 Hwy 70 E
Crossville, Tennessee 38555

Dear Ms. Burgess:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the proposed expansion of the Cumberland Good Samaritans storage building. The owner, Cumberland Good Samaritans, Inc. proposes to expand an existing 4,000 square foot storage building used for donated items such as food, clothing, toys, and furniture by approximately 5,200 square feet. Construction of the pre-fabricated metal building will include minor clearing of vegetation and grade work. The owner has requested funding under the United States Department of Agriculture (USDA), Rural Development Rural Utility Services and is seeking a categorical exclusion under 7 CFR Part 1970(B).

TDEC's Division of Air Pollution Control (APC) has reviewed the provided documentation and proposed construction activities and offers the following comments.

- Fugitive dust will be generated during facility construction activities, including site preparation, clearing, and grading. Dust emissions generated by such activities can vary substantially depending on levels of activity, specific operations, and prevailing meteorological conditions. These emissions are likely to be short term and temporary in nature. It is recommended that conventional dust control measures be employed to mitigate any dust emissions generated. These measures may include wetting by water spray any areas likely to generate fugitive dust during earth moving activities as needed during the construction process. However, the total amount of uncontrolled dust generated by the proposed construction activities is not likely to be of significant concern given the small area to be disturbed.
- Minor exhaust emissions generated by the onsite construction equipment are not likely to be of concern during the project.
- The area in which the project is proposed to occur, Cumberland County, Tennessee, is currently classified as attainment for the previous ozone standard and the other National Ambient Air Quality Standards (NAAQS) pollutants. However, this area has not yet been classified based on the 2012 PM_{2.5} annual standard (12 ug/m³) or the new ozone standard (0.070 ppm, promulgated October 26, 2015).¹
- The proposed project does not include references to demolition of buildings on site. However, if demolition activities do occur, these types of activities are likely to produce fugitive dust emissions that

¹ Current NAAQS are available at <https://www.epa.gov/criteria-air-pollutants/naaqs-table>.

may need to be mitigated if present. If any structures were to be demolished, this would require an asbestos demolition notification to be provided in advance and proper pre demolition surveys to identify any regulated asbestos-containing materials present. All potential asbestos-containing materials in the buildings proposed for demolition would be required to be handled and disposed of according to the applicable Federal, state, and local regulations.²

- No mention was made of using open burning to dispose of tree and brush debris generated during land clearing activities. However, if any open burning activity of tree or limb debris is being considered as part of land clearing operations, this should be conducted in a manner to encourage good smoke dispersion and in accordance with the state open burning regulatory requirements.

TDEC appreciates the opportunity to comment on this proposed project. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



Kendra Abkowitz, PhD
Director of Policy and Planning
Tennessee Department of Environment and Conservation
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cc: Lacey Hardin, TDEC, APC

² TDEC APC Rule 1200-3-4-.01 et seq., <http://share.tn.gov/sos/rules/1200/1200-03/1200-03-04.pdf>. Additional information on open burning in Tennessee is available at <https://tn.gov/environment/article/apc-open-burning> and <http://www.burnsafetn.org/>.